

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1 and 3-9 are currently pending. Claim 1 has been amended; and Claim 2 has been canceled without prejudice by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,305,182 to Chen (hereinafter "the '182 patent") in view of U.S. Patent No. 5,524,104 to Iwata et al. (hereinafter "the '104 patent"); Claim 2 was rejected under 35 U.S.C. § 103(a) as being unpatentable over the '182 and '104 patents, further in view of U.S. Patent No. 5,625,608 to Grewe et al. (hereinafter "the '608 patent"); Claims 3 and 5 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the '182 and '608 patents; and Claims 4 and 6-9 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

Amended Claim 1 is directed to a memory card drive, comprising: (1) a memory card drive body configured to be inserted into a memory card drive slot of a personal computer and to connect to an external interface of the personal computer after insertion; (2) a memory interface configured to allow the memory card drive to send and receive digital information to and from the personal computer; (3) a plurality of memory card slots provided in a memory card tray that is loaded and unloaded from the memory card drive body, the memory card slots being oriented in a planar array to accept a plurality of memory cards in the same loading orientation; and (4) a plurality of indicator LEDs corresponding to the plurality of memory card slots. Claim 1 has been amended to incorporate the limitation recited in Claim 2, and Claim 2 has been canceled without prejudice. Accordingly, no new matter has been

added. Moreover, Applicants respectfully submit that the present amendment to the claims should be entered.

Applicants respectfully submit that the rejection of Claim 1 is rendered moot by the present amendment to Claim 1. However, since Claim 1 has been amended to incorporate a limitation recited in Claim 2, Applicants will address the references cited in the rejection of Claim 2.

The '182 patent is directed to an integrated circuit read/write unit including a housing 10 having two apertures 14 and 15 installed in the mainframe or main body 20 of a computer. As shown in Figures 1 and 2, the '182 patent discloses an IC read/write unit configured to receive two IC cards in a stacked arrangement. However, as admitted in the Office Action, the '182 patent fails to disclose a plurality of indicator LEDs corresponding to a plurality of memory card slots. Further, as implied in the Office Action, the '182 patent fails to disclose that the memory card slots are provided in a memory card tray that is loaded into and unloaded from the memory card drive body, as recited in amended Claim 1 and original Claim 2. Further, Applicants respectfully submit that the '182 patent fails to disclose that the memory card slots are oriented in a planar array to accept a plurality of memory cards in a same loading orientation. Rather, the '182 patent discloses that IC cards are received in two slots, one on top of the other, as shown in Figure 1 of the '182 patent.

The '104 patent is directed to a compact disk drive arrangement wherein one disk drive is mounted on top of another. As shown in Figure 8A, the '104 patent discloses an LED 38 provided for the lower optical drive 31, and a second LED 39 provided for an upper floppy disk drive 32. However, Applicants respectfully submit that the '104 patent fails to disclose a plurality of memory card slots provided in a memory card tray that is loaded and unloaded from a memory card drive body, the memory card slots being oriented in a planar array to accept a plurality of memory cards in a same loading orientation; and a plurality of

indicator LEDs corresponding to the plurality of memory card slots. Rather, the '104 patent merely discloses an LED for a disk drive, and an LED for a CD-ROM drive.

The '608 patent is directed to a remote control device capable of downloading content information from an audio system. As shown in Figure 2, the '608 patent discloses a music tray 20 configured to hold music chips 16. Further, as shown in Figures 2-5, the '608 system includes a remote control unit 30 that includes a display 40. As shown in conjunction with Figure 5, the '608 remote control 30 can be used to select one of the music chips in the music storage tray. However, Applicants respectfully submit that the '608 patent fails to disclose a plurality of indicator LEDs corresponding to a plurality of memory card slots, wherein the plurality of memory card slots are provided in a memory card tray that is loaded and unloaded from the memory card drive body, the memory card slots being oriented in a planar array to accept a plurality of memory cards in the same loading orientation, as recited in Claim 1. The '608 patent does not disclose the indicator LEDs as recited in Claim 1.

Thus, no matter how the teachings of the '182, '104, and '608 patents are combined, the combination does not teach or suggest a plurality of indicator LEDs corresponding to a plurality of memory card slots, wherein the plurality of memory card slots are provided in a memory card tray that is loaded and unloaded from the memory card drive body, the memory card drive slots being oriented in a planar array to accept a plurality of memory cards, as recited in Claim 1. As discussed above, the '104 patent merely discloses a single LED for a single drive, but does not teach or suggest LEDs corresponding to each of a plurality of memory card slots, the memory card slots provided in a memory card tray that is loaded and unloaded from a memory card drive body, as recited in amended Claim 1. Accordingly, for the reasons stated above, Applicants respectfully submit that amended Claim 1 patentably defines over any proper combination of the '104, '608, and '182 patents.

Claim 3 is directed to a portable memory card device, comprising: (1) a portable memory card drive body configured to be inserted into a portable memory card drive slot of a personal computer and to connect to an external interface of the personal computer after insertion; (2) a memory interface configured to allow the memory card drive to send and receive digital information to and from the personal computer; (3) a plurality of memory card slots provided in the portable memory card drive body oriented in a planar array to accept a plurality of memory cards in the same loading orientation; and (4) a memory card selector switch configured to select among the plurality of memory card slots.

Regarding the rejection of Claim 3 under 35 U.S.C. § 103(a), the Office Action asserts that the '182 patent discloses everything in Claim 3 with the exception of the memory card selector switch, and relies on the '608 patent to remedy that deficiency.

As discussed above, the '182 patent is directed to a read/write unit for an integrated circuit card adapted to receive two integrated circuit cards into separate slots. However, as admitted in the outstanding Office Action, the '182 patent fails to disclose a memory card selector switch configured to select among the plurality of memory card slots.

As discussed above, the '608 patent is directed to a remote control device capable of downloading content information from an audio system and for use with an in-home audio player adapted to play pre-recorded music stored in a music chip. As shown in Figure 2, the '608 patent discloses a tray configured to hold a plurality of music chips and a remote control player 30. As shown in Figures 3-5, the '608 patent discloses that the remote control 30 is configured to select among the memory chips located in the slots in the music tray 20.

However, Applicants respectfully submit that the '608 patent fails to disclose a portable memory card drive including a memory card selector switch configured to select among a plurality of memory card slots. The remote control unit 30 disclosed by the '608 patent is *not* part of a portable memory card drive, as required by Claim 3. Rather, the '608 patent

discloses that the remote control device 30 is a separate device from the audio player shown in Figure 2.

Thus, no matter how the teachings of the '182 and '608 patents are combined, the combination does not teach or suggest the memory card selector switch configured to select among the plurality of memory card slots, as recited in Claim 3. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 3 (and dependent Claim 5) should be withdrawn.

Thus, it is respectfully submitted that independent Claims 1 and 3 (and all associated dependent claims) patentably define over any proper combination of the '182, '104, and '608 patents.

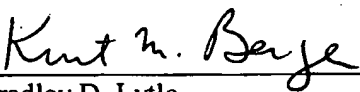
Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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